

Modern Slavery Statement - PE07

This statement sets out the steps that Medicana Healthcare Group Winchester has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Medicana Healthcare Group Winchester has a zero-tolerance approach to any form of modern slavery and human trafficking.

We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chains.

Medicana Healthcare Group Winchester is an independent provider offering self-pay, insurance and NHS services including elective surgical services, surgical support services, outpatient clinic services and diagnostic and support services to the local community and beyond, through the operation of an elective surgical and outpatient centre.

Medicana Healthcare Group Winchester implements its business strategy in an ethically, socially and environmentally responsible manner. We fully acknowledge our responsibility to respect human rights as set out in the [International Bill of Human Rights](#). The IBHR informs all our policies related to the rights and freedoms of every individual who works for us, either as a direct employee, agency worker or indirectly through our supply chain. We are also committed to implementing the [United Nations Guiding Principles on Business and Human Rights](#) throughout our operations. Respect for the dignity of the individual – and the importance of each individual's human rights – form the basis of the behaviours we expect in every workplace nationally.

We will not accept any form of discrimination, harassment or bullying and we require all our managers to implement policies designed to increase equality of opportunity and inclusion for all employees including agency workers. We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain.

Policies

We have several internal policies to ensure that we are conducting business ethically and transparently. These include (from [QCS](#) and [Peninsula](#) for our HR and Recruitment):

- Equality, Diversity and Human Rights Policy (GCR07) where we confirm that we will not tolerate or condone the abuse of human rights within any part of our

business or supply chains and will take seriously any allegations that human rights are not properly respected

- Raising Concerns, Freedom to Speak Up and Whistleblowing Policy (PM11), aimed principally at our employees but also available to others working in our supply chains which encourages staff to report any wrongdoing which extends to human rights violations like Modern Slavery. All reports will be fully investigated, and appropriate remedial actions are taken, and we will work closely with social care and health providers ensuring that our policies and procedures dovetail with local procedures and best practice
- A robust suite of recruitment policies, including conducting eligibility to work in the UK checks for all employees to safeguard
- Employee Code of Conduct consistent with any professional codes of conduct

Direct Communication

The Company encourages members of the public or people not employed by us to write, in confidence, to raise any concern, issue or suspicion of modern slavery in any part of our business.

Suppliers

Key Risks	Supplier Risk Levels	Mitigation
Medicines & Pharmacy Suppliers: Supply shortages or delays Incorrect, expired, or counterfeit medicines Regulatory non-compliance (MHRA, GDP) Over-reliance on a single supplier	High	Use only MHRA-licensed suppliers Secondary/backup suppliers for critical drugs Regular supplier audits and SLA reviews Stock level monitoring and minimum stock thresholds Batch/expiry checks on receipt Clear escalation plan for shortages
Medical Devices & Clinical Equipment: Device failure impacting patient safety Delayed maintenance or calibration Poor recall management Inadequate training from supplier	High	CE/UKCA-marked equipment only Planned preventative maintenance (PPM) contracts Supplier recall notification process Staff training records maintained Equipment inventory with servicing schedule Business continuity plan for critical devices
Clinical Consumables (e.g. PPE, syringes, dressings):	Medium High	Approved supplier list Spot quality checks on delivery

Stockouts during demand surges Substandard or non-compliant products Price volatility		Minimum stock levels and reorder points Multiple suppliers for high-use items Contracted pricing where possible
Pathology & Diagnostic Services: Delayed or inaccurate test results Data breaches (patient information) Transport failures for samples	High	UKAS-accredited laboratories Data protection clauses (UK GDPR) Turnaround time SLAs Incident reporting and escalation pathways Regular performance reviews
Agency & Temporary Clinical Staff: Inadequate qualifications or checks Inconsistent care quality High cost and dependency	High	Use framework-approved agencies only Full compliance checks (DBS, NMC/GMC, references) Induction and local policy training Monitor usage and reduce reliance where possible Clear clinical supervision arrangements
IT Systems & Digital Health Suppliers: Cybersecurity incidents System downtime affecting care delivery Poor data backup or recovery	Med-High	Cyber Essentials / ISO 27001 suppliers Data processing agreements in place Regular backups and disaster recovery testing Downtime and contingency procedures Access controls and audit trails
Facilities, Estates & Maintenance Contractors: Non-compliance with health & safety laws Poor response to critical failures Disruption to clinical services	Medium	Clear SLAs and response times Contractor competency and insurance checks Permit-to-work systems Regular performance and safety reviews
Cleaning, Laundry & Waste Management: Infection prevention failures Non-compliant waste disposal Service disruption	Med-High	Compliance with HTM 01-01 / infection control standards Audits and spot checks Staff training verification Contingency arrangements for service failure
Catering & Food Suppliers: Food safety incidents Allergen mismanagement Service reliability issues Mitigations	Medium	Food hygiene ratings and audits Allergen management procedures Supplier contracts with safety requirements Incident reporting and recall processes

Cross-Cutting Controls (Best Practice):

- Central supplier risk register
- Annual supplier reviews for high-risk suppliers
- Alignment with CQC Regulation 12 (Safe Care and Treatment) & 17 (Good Governance)
- Clear ownership (e.g. Procurement Lead / Governance Lead)

Contract clauses for:

- Termination
- Business continuity
- Incident notification

We conduct due diligence on all suppliers before allowing them to become a preferred supplier. We include an online search to ensure that organisations have never been convicted of offences relating to modern slavery and we include our modern slavery policy as part of our contract with all suppliers. Suppliers are required to confirm that no part of their business operations contradicts this policy. As part of our contract with suppliers, they confirm to us that:

- They have taken steps to eradicate modern slavery within their business. They hold their suppliers to account over modern slavery.
- For UK based suppliers, they pay their employees at least the national minimum wage/national living wage (as appropriate) and to ensure that within their supply chains, where UK based suppliers have overseas supply chains, that their employees' pay is consistent with their national minimum wage requirements, working conditions are safe and fair, there is no child labour and working hours are not excessive

We may terminate the contract at any time should any instances of modern slavery come to light.

Risk Assessments

Our supply chains include procurement of staff, consumables, facilities maintenance, utilities, clinical services and equipment, pharmaceuticals, waste management, information technology, catering, cleaning and housekeeping.

We have conducted a risk assessment and will ensure that we will take further steps to ensure that we support the eradication of modern slavery, that staff understand how to recognise modern slavery and the appropriate safeguarding reporting processes are followed should there be concerns within our supply chains, with customers or suppliers.

Performance indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery is not taking place within our business or supply chain if:

No reports are received from employees, the public, or law enforcement agencies or local safeguarding teams to indicate that modern slavery practices have been identified.

Safeguards

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our business.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Medicana Winchester will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and makes validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

Responsibility for this Statement

The ultimate responsibility for the prevention of modern slavery rests with the [insert who at Senior Management level has responsibility] for ensuring that this policy and its implementation comply with our legal and ethical obligations. Managers at all levels are responsible for ensuring that those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery.

Assessment of effectiveness in preventing Modern Slavery

We understand that modern slavery risk is not static and will continue our approach to mitigating this risk. We will assess the risk via our internal auditing processes.

This statement is made according to [section 54\(1\) of the Modern Slavery Act 2015](#) and constitutes the modern slavery and human trafficking statement of Medicana Winchester for the financial year ending 2026/2027. The CEO of Medicana Winchester has approved this statement.

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Approval for this statement

This statement was approved by the CEO

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Date: 03/01/2026